

**ORIGINAL**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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BETTY ANNE WATERS, as  
Administratrix of the Estate of  
KENNETH WATERS,  
Plaintiff,  
v.

Case No. 04 10521 (GAO) (JGD)

TOWN OF AYER, NANCY TAYLOR-  
HARRIS, in her individual capacity, ARTHUR  
BOISSEAU, in his individual capacity,  
BUDDY DECOT, in his individual capacity,  
WILLIAM ADAMSON, in his individual  
capacity, PHILIP L. CONNORS, in his  
individual capacity, and JOHN DOE and JANE  
DOES 1-16, in their individual capacities,  
Defendants.

**LOCAL RULE 7.2**  
**MOTION TO IMPOUND**  
**DOCUMENTS**

Pursuant to Local Rule 7.2, Plaintiff Betty Anne Waters, by counsel, respectfully moves that the enclosed documents, the reply brief in support of her motion to compel the production of documents from the Middlesex County District Attorney's file in the investigation and prosecution of Kenneth Waters and its accompanying exhibits, be impounded until further order of the Court. Good cause exists for impounding the reply brief and exhibits because they make reference to documents governed by paragraph 5(a) of the Court's protective order of September 26, 2005 (Docket No. 42). Out of an abundance of caution, plaintiff requests that all the enclosed documents be impounded until further notice by the Court.

Dated: October 20, 2006  
New York, NY

Respectfully submitted,

BETTY ANNE WATERS

By: 

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